

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

C. P., by and through his parents,
Patricia Pritchard and Nolle Pritchard;
and PATRICIA PRITCHARD,

Plaintiff,

vs.

BLUE CROSS BLUE SHIELD OF
ILLINOIS,

Defendants.

Case No. 3:20-cv-06145-RJB

**DECLARATION OF SUZANNE LIVORSI
IN SUPPORT OF BLUE CROSS BLUE
SHIELD OF ILLINOIS'S OPPOSITION TO
PLAINTIFFS' MOTION FOR LEAVE TO
FILE SECOND AMENDED COMPLAINT
AND TO ADD PARTIES AS ADDITIONAL
CLASS REPRESENTATIVES**

**NOTE ON MOTION CALENDAR:
OCTOBER 6, 2023**

Pursuant to 28 U.S.C. § 1746, I, Suzanne Livorsi, hereby declare as follows:

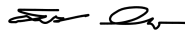
1. I am an employee of Health Care Service Corporation, a Mutual Legal Reserve Company, which does business as Blue Cross Blue Shield of Illinois ("BCBSIL"). I have worked as a Sr. Project Coordinator at BCBSIL for 6 years. I have personal knowledge or knowledge based on records and information available to me of the facts contained in this affidavit and, if called to testify in this matter, I could competently testify to each of the facts set forth herein.

2. Based on BCBSIL's review of the claims data for Emmett Jones, BCBSIL does not have any record of any denial for treatment or procedure based on a gender-affirming care exclusion.

1 3. Mr. Jones does not have any appeals pertaining to denials for medical necessity or
2 plan exclusions and Mr. Jones does not have any prior authorization requests or denials of prior
3 authorization requests.

4 4. I declare, under penalty of perjury under the laws of the United States of America,
5 that the foregoing is true and correct.

6 DATED this 6th day of October 2023, at Aurora, Illinois.

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Suzanne Livorsi

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CERTIFICATE OF SERVICE

I certify that on the date indicated below I electronically filed the foregoing,
DECLARATION OF SUZANNE LIVORSI IN SUPPORT OF BLUE CROSS BLUE SHIELD
OF ILLINOIS'S OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND
AMENDED COMPLAINT AND TO ADD PARTIES AS ADDITIONAL CLASS
REPRESENTATIVES with the Clerk of the Court using the CM/ECF system which sent
notification of such filing to the following:

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DATED this October 10, 2023.

Kilpatrick, Townsend & Stockton LLP

By: /s/ Gwendolyn C. Payton
Gwendolyn C. Payton, WSBA #26752
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*Counsel for Defendant Health Care Service
Corporation, a Mutual Legal Reserve
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